

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

VOLKSWAGEN AG, VOLKSWAGEN OF  
AMERICA, INC., and BUGATTI  
INTERNATIONAL, S.A.,

Plaintiffs,

v.

THE BUGATTI, INC.,

Defendant.

CIVIL ACTION  
No. 05-11067-PBS

MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT  
(ASSENTED-TO)

Defendant, The Bugatti, Inc. moves that the period for filing its response to the Plaintiffs' complaint in accordance with the Fed. R. Civ. P. 12(a)(1)(A) be extended from July 13, 2005 to July 27, 2005. Defendant was served with the complaint on May 23, 2005. The time for Defendant to respond to the complaint was extended from May 24, 2005 to July 13, 2005 as Defendant had not obtained counsel.

Defendant now has retained the undersigned counsel to represent it in this matter. The additional time sought in this motion will provide Defendant's counsel adequate time to review the allegations in the complaint and permit the Defendant to respond accordingly.

The Plaintiffs do not oppose the present motion and extension.

WHEREFORE, Defendant, The Bugatti, Inc., respectfully requests that the time for responding to Plaintiff's complaint be extended to July 27, 2005.

Respectfully submitted,

**THE BUGATTI, INC.**

*By its attorneys,*

/s/ David M. Magee.  
Victor H. Polk, Jr., BBO #546099  
David M. Magee, BBO #652399  
**BINGHAM McCUTCHEN LLP**  
150 Federal Street  
Boston, Massachusetts 02110  
Tel: (617) 951-8000  
Fax: (617) 951-8736

Dated: July 12, 2005